

July 26, 2016

*Via Electronic And Certified U.S. Mail*

Lauren Lane  
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CAMPBELL PERRY LLC

RE: Dr. Richard Carrier -- Defamatory Allegations

Dear Ms. Lane:

Please be advised that our office has been retained by Dr. Carrier concerning false and defamatory allegations in your recent Skepticon.org post. You are hereby ordered to immediately **CEASE AND DESIST** making any further false and/or defamatory statements about Dr. Carrier.

It is unlawful to engage in defamation of another's character and reputation. Defamation consists of broadcast statements, that a speaker either knows to be false or makes with reckless disregard as to truth or falsity, that lower a person's esteem in the community or deter others from associating with him. Injury to reputation is presumed if the defamation concerns statements that a person is guilty of a crime involving moral turpitude, or about a person's business or profession. According to your online statements, you allege very serious charges that include sexual harassment, repeated unwanted or boundary-pushing behavior, and intentional unwanted behavior, perpetrated upon multiple women, to wit:

**KEEPING  
SKEPTICON SAFE:  
RICHARD CARRIER  
TO BE BANNED**

by Lauren Lane | Jun 20, 2016 | 0 comments

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Dublin, OH 43017

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**Plaintiff's  
Exhibit 8**





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In light of the recent revelations of sexual harassment, unwelcome attention, and/or unwanted behavior from more than one prominent atheist, Skepticon would like to renew our vow to keep our attendees, speakers, volunteers, vendors, organizers, and anyone else involved in Skepticon safe at our events.

The accusations specifically against Richard Carrier are, sadly, not so surprising to the Skepticon organizers. While he was a featured speaker for many years, we stopped inviting him to speak partly because of his repeated boundary-pushing behavior, including towards someone involved in Skepticon. What has been made clear by the recent discussions is that our attendees' well being and comfort is put at an unacceptable risk by Carrier's presence, and so we are officially prohibiting Richard Carrier from attending any future Skepticons.

We support the accusers.

It is unfortunate there are people in this world who believe they can violate others' boundaries without consequence. Skepticon does not want those people at our events.

Our harassment policy can be found [here](#). We are currently refining our method of handling such complaints so as to be as effective as possible when faced with them. We are investigating formal training options for our organizers and volunteers, and are forming a team who will be dedicated to protecting everyone at Skepticon.

Your statements, published on Skepticon.org, accused Dr. Carrier of a crime involving moral turpitude and lowered his professional reputation. Dr. Carrier vigorously disputes the entirety of these allegations. Your statements appear to be, in part, derivative of the claims alleged by Ms. Amy Frank, of the ASU Secular Student Alliance. Ms. Frank's allegations of sexual assault and harassment are false, and contradicted by multiple

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eyewitnesses, and an independent professional investigation did not conclude assault or harassment occurred.

Claims of this nature require facts, supported by evidence. You have not presented any evidence to support your allegations. You stated that Skepticon stopped inviting Dr. Carrier to speak, allegedly because of repeated boundary-pushing behavior. Dr. Carrier was not invited to speak in 2014, and has not spoken at Skepticon since 2013. But Ms. Frank's 2016 publication alleges an incident sometime in 2015. Accordingly, even if there were any truth to Ms. Frank's claim - and there is not - there can be no nexus between Skepticon's choice of speakers in 2014 and Ms. Frank's accusations. Moreover, you bear a responsibility, before circulating unverified rumors and innuendo, to make a good faith effort to investigate and substantiate their veracity. As you've made no such effort, your statements are without basis in reality or fact. Your statements are defamatory, intentionally reckless and malicious.

On information and belief, you and Dr. Carrier had a prior relationship that ended under circumstances suggesting an ulterior motive. In or around November 2008, Dr. Carrier, at that time married, was introduced to you at the first Skepticon. For five years subsequent, you and Dr. Carrier exchanged mutual, consensual flirtations. In 2012, at Skepticon 5, you initiated an extramarital sexual relationship with Dr. Carrier, spending two nights together in a conference hotel room. Your affair with Dr. Carrier continued at the American Atheists conference in Austin Texas, in March of 2013. Thereafter, conflicted emotionally about cheating on his wife, Dr. Carrier ended the relationship. You persistently urged Dr. Carrier to reconsider, even after his repeated requests to stop. His boundaries ignored, Dr. Carrier was forced to end all communications and avoid further contact. Multiple witnesses will corroborate the foregoing.

By November 2013, Dr. Carrier and his then wife were attempting an open marriage. One week before Skepticon 6, mistakenly assuming the attraction remained mutual, Dr. Carrier pursued a reunion and messaged you. Dr. Carrier regrets the inconsiderate and awkward tone of his message. Your response, electronic and in person, made abundantly clear your anger and disinterest. Dr. Carrier apologized sincerely, electronically and in person, and has respected your wishes ever since. For the duration of the conference, Dr. Carrier accompanied another woman, about which you also expressed displeasure.

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You now claim, in your June 20, 2016 Skepticon article, to have personal knowledge that Dr. Carrier sexually harassed multiple women with repeated boundary-pushing behavior, and that he continued such behavior after told it was unwanted. In fact, you have no evidence to support your claim, nor anyone else's claim. You also allege multiple complaints about Dr. Carrier's behavior at prior Skepticons. However, other than from yourself, no complaint has ever been made concerning Dr. Carrier's behavior at Skepticon, by any attendee, staff member, or official. Your claim, that multiple women brought multiple complaints, is therefore baseless and false. Even if you heard opinions unfavorable of Dr. Carrier, circulating rumors as fact, without investigation as to truth or falsity, is at best reckless. In light of your muddled history with Dr. Carrier, your intent gives rise to malice.

Accordingly, we demand that you:

- (1) Immediately cease and desist your unlawful defamation of Dr. Carrier, and
- (2) Within ten days of the date of this correspondence provide us written assurances that you will cease and desist from further defamation of Dr. Carrier's character and reputation, and show proof of all published retractions as specified below, and
- (3) Publish a full written retraction, on Skepticon.org and every other public forum wherein your defamatory statements were made, including, but not limited to, your false statements that:
  - a. Dr. Carrier engaged in sexual harassment at Skepticon or any other event, and that
  - b. Dr. Carrier ever repeatedly pushed anyone's boundaries, and that
  - c. Dr. Carrier ever continued behavior he was told was unwanted, and that
  - d. Dr. Carrier's behavior at Skepticon was ever the subject of any complaint by a Skepticon attendee, staff member, or official, and that
  - e. Dr. Carrier's attendance at Skepticon ever posed an unacceptable risk to attendees.
- (4) Further, we demand that you reimburse Dr. Carrier's reasonable attorney's fees and costs relative to the above referenced matter.

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Once you have had an opportunity to review the contents of this letter, you or your attorney should certainly contact my office to discuss these issues, options, and courses of action. Should we not hear from you or receive your written assurances before the above noted deadline, I will have no choice but to advise my client as to all legal and equitable remedies that he may have available to him in regard to this matter, including, but not limited to, bringing a claim for defamation *per se* with a request for punitive damages.



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Please do not attempt to contact Dr. Carrier directly and refer all correspondences instead to my attention. I look forward to working with you in this matter.

Sincere Regards,

Jeffrey T. Perry, Esq.  
Campbell Perry, LLC  
Supreme Court No.: 0088989

cc: Dr. Richard Carrier  
Jeffrey Markus, Registered Agent, Skepticon Inc.

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